



The voice of mid-size communications companies

August 11, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Ex Parte* Communication: MD Docket No. 16-166

Dear Ms. Dortch:

On August 10, 2016, Jeb Benedict of CenturyLink, AJ Burton of Frontier, and Mike Jacobs and the undersigned representing ITTA met with Commissioner Clyburn's Legal Advisor Daudeline Meme, and on August 11, 2016 Jeb Benedict of CenturyLink, AJ Burton of Frontier, and Mike Jacobs and the undersigned representing ITTA met with Commissioner Pai's Legal Advisor Nicholas Degani regarding the Commission's annual assessment and collection of regulatory fees.¹

We discussed the disproportionate regulatory fee burden borne by wireline voice providers and their customers and the need for the Commission to adjust its regulatory fee structure to ensure that regulatory fees are applied in a competitively neutral manner that correlates to industry trends and the Commission's current workload. We expressed our continued support for the Commission to address this problem by combining wireless voice providers into the ITSP regulatory fee category so that all voice providers pay regulatory fees associated with the work of the Wireline Competition Bureau on the same basis. There is clear precedent for the Commission to adopt this approach, similar to how it combined interconnected VoIP,² IPTV,³ and DBS providers⁴ into additional fee categories in recognition of the work

¹ See *In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 2015*, Report and Order and Further Notice of Proposed Rulemaking, MD Docket No. 15-121 (rel. Sept. 2, 2015) ("*FY 2015 NPRM*").

² See *In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 2007*, MD Docket No. 07-81, Report and Order and Further Notice of Proposed Rulemaking, FCC 07-140, ¶¶ 11-20 (rel. Aug. 6, 2007) ("*FY 2007 R&O*").

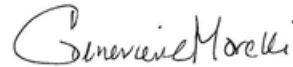
³ See *In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 2013; Procedures for Assessment and Collection of Regulatory Fees; Assessment and Collection of*

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performed by other core bureaus overseeing such entities. We also discussed incremental steps the Commission might take – such as reassigning certain Wireline Competition Bureau FTEs to the Wireless Telecommunications Bureau – that could help mitigate the undue regulatory fee burden borne by wireline voice providers.

Please do not hesitate to contact the undersigned with any questions regarding this submission.

Respectfully submitted,

A handwritten signature in cursive script that reads "Genevieve Morelli".

Genevieve Morelli
President

cc: Daudeline Meme
Nicholas Degani

Regulatory Fees for Fiscal Year 2008, MD Docket Nos. 13-140, 12-201, 08-65, Report and Order, FCC 13-110, ¶¶ 32-33) (rel. Aug. 12, 2013).

⁴ See *In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 2015; Amendment of Part 1 of the Commission's Rules; Assessment and Collection of Regulatory Fees for Fiscal Year 2014*, MD Docket Nos. 15-121, 14-92, Notice of Proposed Rulemaking, Report and Order, and Order, FCC 15-59, ¶¶ 28-41 (rel. May 21, 2015).